

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 00-6324-CR-ZLOCH

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN RAFFA,

Defendant.

FILED
01 JAN 11 PM 3:32
CLARENDON COUNTY
CLERK
S.D.



JOINT MOTION TO TRANSFER SIMILAR ACTION

The Defendant, JOHN RAFFA ("Raffa"), through undersigned counsel and the Government, by and through Assistant U.S. Attorney Diana Fernandez, pursuant to Rule 3.9C of the Local Rules for the Southern District of Florida, file this Motion to Transfer, and in support thereof state the following:

1. On or about November 20, 2000 the Government filed the Information herein charging Raffa with two counts of making false statements in violation of Title 18, U.S.C. Section 1001.
2. Raffa also has pending before the Honorable Paul C. Huck, an Indictment charging him with Conspiracy to Launder Money, in violation of Title 18, U.S.C. Section 1956(h).
3. Raffa has entered into a plea agreement with the Government in which he has agreed to plead guilty to Count 1 of the Indictment (Case No. 00-6181-CR-Huck) pending before Judge Huck as well as the two count Information pending before this Court.
4. A change of plea has been scheduled before Judge Huck on January 23, 2001. Raffa is prepared to plead guilty, pursuant to the plea agreement, to both cases.



5. Rule 3.9C of the Local Rules for the Southern District of Florida provides in pertinent part that:

Whenever an action or proceeding is filed in the Court which involves subject matter which is a material part of the subject matter of another action or proceeding then pending before this Court, or for other reasons the disposition thereof would appear to entail the unnecessary duplication of judicial labor if heard by a different Judge, the Judges involved shall determine whether the newly filed action or proceeding shall be transferred to the Judge to whom the earlier filed action or proceeding is assigned.

6. Raffa and the Government believe that the transfer of this case to Judge Huck for plea purposes will avoid unnecessary duplication of judicial labor.

WHEREFORE, for the foregoing reasons, the Government and the Defendant jointly request that this cause be transferred to the Honorable Paul C. Huck so that both of the Defendant's cases may be simultaneously resolved by a change of plea on January 23, 2001.

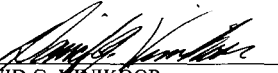
Respectfully submitted,

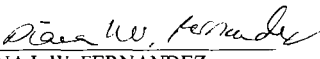
- and -

Respectfully submitted,

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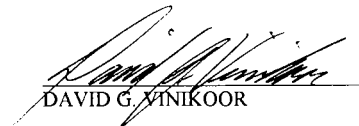
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By: 
DAVID G. VINIKOOR
FL BAR #195719

By: 
DIANA L.W. FERNANDEZ
Assistant United States Attorney
Court ID#: A5500017

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this Joint Motion to Transfer Similar Action has been furnished by Hand Delivery this 11th day of January, 2001, to: Diana Fernandez, Assistant United States Attorney, 500 E. Broward Blvd., 7th Floor, Fort Lauderdale, FL 33394.


DAVID G. VINIKOOR